

Paul Shane Miller 412.594.5503
smiller@tuckerlaw.com

Jeremy V. Farrell 412.594.3938
jfarrell@tuckerlaw.com

November 12, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, PA 17120

**RE: Application of We C.A.R.E. Transportation Services LLC
Docket No. A-2020-3020503**

Dear Secretary Chiavetta:

Enclosed please find an Uncontested Motion for Continuance of Hearing filed on behalf of We C.A.R.E. Transportation Services LLC in the above-captioned matter. A copy of this document has been served upon opposing counsel and Administrative Law Judge F. Joseph Brady in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,

/s/ Paul Shane Miller

Paul Shane Miller
Attorney for We C.A.R.E. Transportation Services LLC

Jeremy V. Farrell
Attorney for We C.A.R.E. Transportation Services LLC

Enclosure

cc: Tanya Leshko, Esq. (with enclosure) (via e-mail)
Thomas T. Niesen, Esq. (with enclosure) (via e-mail)
Administrative Law Judge F. Joseph Brady (with enclosure) (via e-mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of :
We C.A.R.E. Transportation Services LLC : Docket No. A-2020-3017606

**UNCONTESTED MOTION FOR
CONTINUANCE OF HEARING**

Filed on Behalf of We C.A.R.E.
Transportation Services LLC

Counsel of Record for this Party:

Paul Shane Miller, Esquire
Pa. I.D. #319174
smiller@tuckerlaw.com
Jeremy V. Farrell, Esquire
Pa. I.D. #316258
jfarrell@tuckerlaw.com

TUCKER ARENSBERG, P.C.
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of :
We C.A.R.E. Transportation Services LLC : Docket No. A-2020-3017606

UNCONTESTED MOTION FOR CONTINUANCE OF HEARING

TO THE HONORABLE COMMISSION:

We C.A.R.E. Transportation Services LLC, by and through its respective attorneys, file this Uncontested Motion for Continuance of Hearing in accordance with 52 Pa. Code § 1.15(a)(1).

1. An initial telephonic hearing is currently scheduled to take place on Thursday, November 19, 2020 at 10:00 a.m.

2. Counsel for We C.A.R.E. Transportation Services LLC (We C.A.R.E.) was retained on November 10, 2020 and has not had sufficient time to prepare for the scheduled hearing.

3. Counsel for We C.A.R.E. contacted counsel for the protesting parties by e-mail on November 10, 2020 to inquire as to whether they would consent to a 45-60 day continuance of the hearing in this matter.

4. Counsel for We C.A.R.E. subsequently spoke to counsel for the protesting parties by phone and discussed a continuance of the hearing in this matter.

5. Counsel for the protesting parties informed We C.A.R.E.'s counsel that they do not object to the continuance request.

6. We C.A.R.E.'s counsel contends that a continuance of 60 days is appropriate in this case for two reasons. One, the parties intend to explore settlement,

which could either limit the issues that need to be addressed at the hearing or obviate the need for a hearing altogether. Second, a continuance would give counsel for We C.A.R.E. adequate time to get up to speed on the case.

7. Therefore, We C.A.R.E. respectfully requests that the hearing be continued for 60 days.

WHEREFORE, We C.A.R.E. Transportation Services LLC respectfully requests a 60 day continuance of the currently scheduled hearing date.

TUCKER ARENSBERG, P.C.

BY: Paul Shane Miller, Esquire

Paul Shane Miller, Esquire

Pa. I.D. #319174

smiller@tuckerlaw.com

Jeremy V. Farrell, Esquire

Pa. I.D. #316258

jfarrell@tuckerlaw.com

1500 One PPG Place

Pittsburgh, PA 15222

(412) 566-1212

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of :
We C.A.R.E. Transportation Services LLC : Docket No. A-2020-3017606

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Uncontested Motion for Continuance of Hearing upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Administrative Law Judge F. Joseph Brady
Pennsylvania Public Utility Commission
Suite 4063
801 Market Street
Philadelphia, PA 19107
(via e-mail at pmcneal@pa.gov)

Tanya Leshko, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second St., Suite 500
Harrisburg, PA 17101-1347
(via email at tanya.leshko@bipc.com)

Thomas T. Niesen, Esquire
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
(via email at tniesen@tntlawfirm.com)

Date: November 12, 2020

/s/ Paul Shane Miller

Paul Shane Miller, Esquire

PA I.D. No. 319174

(412) 594-5503

smiller@tuckerlaw.com

Jeremy V. Farrell, Esquire

PA I.D. No. 316258

(412) 594-3938

jfarrell@tuckerlaw.com

1500 One PPG Place

Pittsburgh, PA 15222

(412) 594-5619 (fax)